



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2000 S. Mays, Suite 300
Round Rock, TX 78664
Tel (512) 671-3434
Fax (512) 671-3446

October 6, 2005
(PBW Project No. 1259)

VIA ELECTRONIC MAIL

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: September 2005 Monthly Status Report, Gulfeo Marine Maintenance Site, Freeport,
Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Preparation of Draft RI/FS Work Plan (SOW Paragraph 17) – document to be submitted to EPA by October 11, 2005;
 - Preparation of Draft RI/FS Sampling and Analysis Plan (SAP)(SOW Paragraph 25) – document to be submitted to EPA by October 11, 2005; and
 - Submittal of extension request for Draft RI/FS Work Plan and Draft SAP – submitted to EPA on September 23, 2005.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:

- Submittal of Draft RI/FS Work Plan (SOW Paragraph 17) – to be submitted to EPA by October 11, 2005;
- Submittal of Draft RI/FS SAP (SOW Paragraph 25) – to be submitted to EPA by October 11, 2005;
- Submittal of Financial Assurance (UAO Paragraph 83) – to be submitted by October 26, 2006; and
- Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) (UAO Paragraph 72) – to be obtained by October 28, 2005 (per August 25, 2005 extension request approved by EPA on September 20, 2005).

4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – The scope of activities to be performed as part of the RI/FS will be described in the RI/FS Work Plan. Until that work plan has been prepared and approved by EPA, it is not possible to estimate a percentage completion for the project.

As described in a September 23, 2005 letter to you and Ms. Barbara Nann of EPA from Ms. Elizabeth Webb of Thompson & Knight, LLP, a two-week extension was requested for submittal of the Draft RI/FS Work Plan and Draft SAP. Based on this two-week extension, the requested revised submittal date is October 11, 2005. The reasons the extension was needed were as follows:

- Two key members of the work plan review team, including one of the primary technical reviewers, were forced to close their offices and/or evacuate from the Houston area in response to the approaching Hurricane Rita. Thus, review time was necessarily and unavoidably lost.
- It was anticipated that Hurricane Rita, which made landfall on September 24, 2005, might impact conditions at the site. A site inspection by PBW on September 26, 2005 suggested no observable impacts at the Site from the hurricane. A summary memorandum and photographs for this Site visit were provided to you via electronic mail on September 28, 2005. EPA, Texas Commission on Environmental Quality (TCEQ), and EPA contractor personnel visited the Site and collected sediment samples on September 28, 2005. It is our understanding that these personnel did not report significant hurricane impacts, either.

Although the concept of an extension to the RI/FS Work Plan and SAP submittal date was verbally approved by you in a telephone conversation on September 23, 2005, a formal response to the two-week extension requested in Ms. Webb's letter has not been received to date. We are currently working under the assumption that the requested revised submittal date of October 11, 2005 will be acceptable. Please advise us immediately if this assumption is not correct.

Mr. Gary Miller
October 6, 2005
Page 3 of 3

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a long horizontal stroke extending to the right.

Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation
Mr. Scott Magelssen - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP